

(24)
9/25/02
MHT

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**HARRY E. WILLIAMS JR.,
Plaintiff**

: CIVIL ACTION NO.: 1:CV-01-0877

v.

J. Franklin

**PENNSYLVANIA TURNPIKE COMMISSION,
Defendants**

:

**FILED
HARRISBURG, PA**

SEP 24 2002

MOTION FOR ENLARGEMENT OF TIME

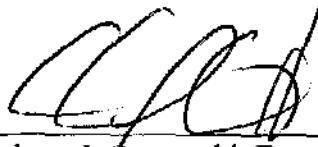
*MARY E. DOWNEY, CLERK
Court Clerk*

AND NOW, comes Plaintiff, through his attorney Andrew J. Ostrowski, Esquire, and in support of his Motion for Enlargement of Time, aver as follows:

1. Defendant filed a Motion for Summary Judgment on August 30, 2002, and Plaintiff received an enlargement of time, until September 24, 2002, within which to respond.
2. Being filed concurrently herewith is Plaintiff's response to Defendant's Statement of Material Facts and supporting documents, but, due to a staffing shortage, Plaintiff's Counsel has been unable to complete the brief in opposition to Defendant's Motion, and requests a one-day enlargement of time, until September 25, 2002, within which to file his supporting brief.
3. Under the circumstances, Plaintiff submits that cause exists for granting an enlargement of time, until September 25, 2002 within which to file his brief in opposition to Defendant's Motion for Summary Judgment.

WHEREFORE, Plaintiff respectfully requests that this Court enter an appropriate order granting an enlargement, until September 25, 2002, within which to respond to Defendant's Motion for Summary Judgment.

Respectfully Submitted,

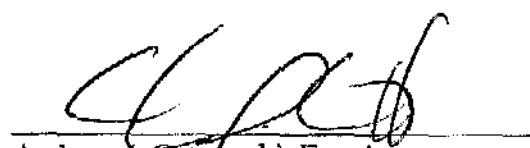


Andrew J. Ostrowski, Esquire
I.D. No. 66420
4311 North Sixth Street
Harrisburg, PA 17110
(717) 221-9500
Attorney for Plaintiff

Dated: September 24, 2002

CERTIFICATE OF NONCONCURRENCE

I, Andrew J. Ostrowski, certify that I have contacted Counsel for Defendant, but have been unable to secure his concurrence or nonconcurrence in the foregoing Motion for Enlargement of Time.



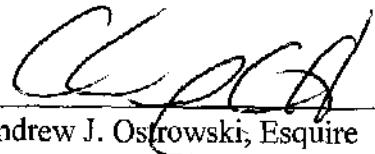
Andrew J. Ostrowski, Esquire
I.D. No. 66420
4311 North Sixth Street
Harrisburg, PA 17110
(717) 221-9500
Attorney for Plaintiff

Dated: September 24, 2002

CERTIFICATE OF SERVICE

I, Andrew J. Ostrowski, Esquire, hereby certify that I have served a true and correct copy of the foregoing document by depositing the same in the U.S. Mail, first class, postage prepaid, addressed as follows:

John C. Romeo, Esquire
Fox, Rothschild, O'Brien & Frankel
2000 Market Street, Tenth Floor
Philadelphia, PA 19103-2706

By 
Andrew J. Ostrowski, Esquire

Dated: September 24, 2002